

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GBFOREFRONT, L.P.,

Plaintiff,

-against-

FOREFRONT MANAGEMENT GROUP, LLC,
FOREFRONT CAPITAL MANAGEMENT,
LLC, FOREFRONT CAPITAL MARKETS,
LLC AND FOREFRONT ADVISORS, LLC,

Defendants.

Civil Action No.: 2:11-cv-07732-MSG

DECLARATION OF SEAN L. CORGAN

Sean L. Corgan, an attorney duly admitted to practice in this court, declares under the laws of the United States of America as follows:

1. I am a member of the law firm of Ricci, Tyrell, Johnsen and Grey, attorneys for Defendants, Forefront Management Group, LLC, Forefront Capital Management, LLC, Forefront Capital Markets, LLC, and Forefront Advisors, LLC, and therefore, I have knowledge of the facts set forth herein. I make this declaration in opposition to Plaintiff GBForefront, LP's motion seeking entry of the May 22, 2015 Consent Judgment and in further support of Defendants' cross motion to vacate the April 28, 2015 Judgment and the May 28, 2015 Amended Judgment and to dismiss the action for lack of subject matter jurisdiction.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the transcript of the hearing held before The Honorable Mitchell S. Goldberg, U.S.D.J. on May 25, 2016.

I declare under the laws of the United States of America that the foregoing is true and correct.



Sean L. Corgan

Dated: July 14, 2016